

EXHIBIT 49

1

2 UNITED STATES DISTRICT COURT.
3 SOUTHERN DISTRICT OF NEW YORK

3 -----X
4 MARK I. SOKOLOW, et al.,

4

5 PLAINTIFFS,

5

6 -against- Case No:
7 04CV397 (GBD) (RLE)

7

8 THE PALESTINE LIBERATION ORGANIZATION, et
9 al.,

10 -----X

11

12 DATE: July 13, 2012

13 TIME: 10:02 A.M.

14

15

16 DEPOSITION of REBEKAH BLUTSTEIN,
17 taken by the Defendants, pursuant to Notice
18 and to the Federal Rules of Civil
19 Procedure, held at the offices of Morrison
20 & Foerster, 1290 Avenue of the Americas,
21 New York, New York 10104, before Robert X.
22 Shaw, CSR, a Notary Public of the State of
23 New York.

24

25

1 Rebekah Blutstein

2 A. No.

3 Q. Where were you?

4 A. I was in my house in

5 Harrisburg, Pennsylvania, in my parents'
6 house.

7 Q. In your parents house. And did
8 you ever see your brother's body after he
9 died?

10 MR. SOLOMON: Objection.

11 You can answer.

12 A. NO.

13 Q. And do you know whether your
14 brother died instantaneously on that day?

15 MR. SOLOMON: Objection. I
16 note the witness is not a physician
17 yet.

18 MR. NIELSEN: I'm just asking
19 if she's heard of that.

20 MR. SOLOMON: Off the record.

21 (Whereupon, an off-the-record
22 discussion was held.)

23 Q. Any information that you have
24 on that.

25 A. I have no information on that.

1 Rebekah Blutstein

2 deposed right now?

3 A. I believe I do.

4 Q. Who are they?

5 A. The Palestinian Authority and
6 Palestinian Liberation Organization.

7 Q. Why did you sue the PLO?

8 A. Um --

9 MR. SOLOMON: Objection.

10 A. Because I believe, because I
11 have been told, that the PLO is also
12 somewhat responsible for my brother's
13 murder, or supporting terrorists that
14 carried out my brother's murder.

15 Q. Were you told how the PLO might
16 have been involved in your brother's death?

17 MR. SOLOMON: Objection.

18 Go ahead.

19 A. No.

20 Q. Are you aware of any evidence
21 that the PLO had anything to do with your
22 brother's death, beyond what you've been
23 told?

24 MR. SOLOMON: Objection.

25 Go ahead.

1 Rebekah Blutstein

2 A. I believe that my lawyers have
3 evidence, which is why I've hired them, but
4 I am not personally aware. I have never,
5 personally, seen any such evidence.

6 Q. Got you.

7 Let's do the same thing with
8 the PA: Why did you sue the PA?

9 A. Again, a similar reason, I
10 believe they are responsible for my
11 brother's death.

12 Q. And why do you believe the PA
13 is responsible for your brother's death?

14 A. Because I have been told so by
15 my father and my, and the lawyers that I've
16 hired in this case.

17 Q. And have you seen any
18 documents, or other evidence, to inform you
19 of why the PA might be responsible for your
20 brother's death?

21 A. Again, I have not, personally,
22 seen any such documents.

23 Q. So, your claims against the PA
24 are based on only on what your father and
25 your lawyers have told you?

1 Rebekah Blutstein

2 A. Yes.

3 Q. Did your father ever describe
4 any evidence that he had seen to support
5 the claims that --

6 Well, first of all, is your
7 father a Plaintiff in all the same lawsuits
8 as you?

9 A. I believe so.

10 Q. And let's just go with the PA
11 and PLO at this point. Has your father
12 ever told you about any evidence that he
13 has seen to support the claims that you're
14 bringing against the PA and PLO?

15 MR. SOLOMON: Objection.

16 You can answer.

17 A. Ah --

18 MR. SOLOMON: Take your time.

19 THE WITNESS: Thank you.

20 A. Okay. So, my father has spoken
21 to me quiet a bit about how he believes
22 terrorism happens and how he believes
23 specifically the terrorist attack that
24 killed my brother occurred and who he
25 thinks has caused this.